

- 4E. (Withdraw) Claim 13 is deleted.
- 4F. Claim 14, Line 1. ~~of claim 1 and 3~~
- 4G. Claim 15, Line 1. ~~of claim 1 and 3.~~
- 4H. Claim 15, Line 6. ~~distances that define distances define.~~
- 4I. Claim 16, Line 1. ~~of claim 1 and 3.~~
- 4J. Claim 17, Line 1. ~~of claim 1 and 3.~~
- 4K. (Withdraw) Claim 18 is deleted.
- 4L. (Withdraw) Claim 18 is deleted.
- 5. No correction is required.
- 6. The following corrections are made:
 - 6A. (Withdraw) Claim 1 is deleted.
 - 6B. (Withdraw) Claim 1 is deleted.
 - 6C. (Withdraw) Claim 3 is deleted.
 - 6D. (Withdraw) Claim 12 is deleted.
 - 6E. Claim 14, Line 2. wherein the steps of specifying parameters ~~wherein the steps of setting parameters.~~
 - 6F. Claim 15, Line 2. wherein the steps of specifying parameters ~~wherein the steps of setting parameters.~~
 - 6G. Claim 16, Line 2. wherein the steps of specifying parameters ~~wherein the steps of setting parameters.~~
 - 6H. Claim 17, Line 2. wherein the steps of specifying parameters ~~wherein the steps of setting parameters.~~
 - 6I. (Withdraw) Claim 18 is deleted.
- 7. No correction is required.
- 8. Claim 19 is rewritten.
- 9. No correction is required.
- 10. No correction is required.
- 11. The following corrections are made:
 - 11A. (Withdraw) Claim 2 is deleted.
 - 11B. (Withdraw) Claim 4 is deleted.
 - 11C. (Withdraw) Claim 3 is deleted.
 - 11D. (Withdraw) Claim 10 is deleted.
- 12. No correction is required.
- 13. The following corrections are made:
 - 13A. (Withdraw) Claim 1 is deleted.
 - 13B. (Withdraw) Claim 2 is deleted.
 - 13C. (Withdraw) Claim 5 is deleted.
 - 13D. (Withdraw) Claim 4 is deleted.
 - 13E. (Withdraw) Claim 6 is deleted.
 - 13F. (Withdraw) Claim 7 is deleted.
 - 13G. (Withdraw) Claim 9 is deleted.
 - 13H. (Withdraw) Claim 10 is deleted.

13I. Liddy et al. did not invent IVI-API. The phrase, "IVI-API", is created by the author of this invention, so are the contents associated with this phrase. In particular, the API is not addressed by Liddy et al. at all. Figure 1 is a block diagram of Liddy's system. The API for the Liddy system is not addressed at all in the patent. Note that API is not an algorithm.

14. The following corrections are made:

14A. (Withdraw) Claim 1 is deleted.

14B. (Withdraw) Claim 17 is deleted.

15. The following corrections are made:

15A. (Withdraw) Claim 1 is deleted.

15B. (Withdraw) Claim 12 is deleted.

15C. (Withdraw) Claim 18 is deleted.

16. No correction is required.

17. The following corrections are made:

17A. (Withdraw) Claim 13 is deleted.

18. The following corrections are made:

18A. (Withdraw) Claim 3 is deleted.

19. No correction has been made. The comments are irrelevant to the related invention:

19A. Claim 14:

Drossu et al. 's invention is irrelevant here; the number of neural nets is never an issue in this claim.

Tsai et al. 's invention is irrelevant here; "SOM that are interaction with each other at the output of each SOM that is capable of being embedded ..." is never an issue in this claim. This claim addresses neither interaction between neurons nor embedding of neural nets.

This claim addresses using a particular parameter.

19B. Claim 16:

Drossu et al. 's invention is irrelevant here; the number of neural nets is never an issue in this claim.

Tsai et al. 's invention is irrelevant here; "SOM that are interaction with each other at the output of each SOM that is capable of being embedded ..." is never an issue in this

APRIL 8, 2006

claim. This claim addresses neither interaction between neurons nor embedding of neural nets.

This claim addresses using a particular parameter.

20. The following corrections are made:

20A. (Withdraw) Claim 15 is deleted.

20B. "Neighborhood" and "measure" are concepts that are not patentable. What is patentable is to use the concept in a particular setting. It is not "obvious" how to associate a color image to another color image in such a way that two color images are in the same "Neighborhood" as defined by a certain "measure". In that sense, Claim 15 stands, because what have been used are concepts, thus the claim does not infringe on Jensen et al's patent.

Jensen's work, "content stream ..." is irrelevant in Claim 15. This claim addresses using a particular parameter.

Rajagopal et al. again failed to demonstrate how to associate a color image with another color image in such a way that the two color images are in the same "Neighborhood" as defined by a certain "measure". It is NOT obvious that "these two color images are in the same Neighborhood" or "these two color images are NOT in the same Neighborhood".

21. No correction is required.

Thanks again for your help.

With Kindest Regards,



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